

**IN THE UNITED STATES DISTRICT COURT FOR  
THE EASTERN DISTRICT OF PENNSYLVANIA**

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MARA FLAMM,

Plaintiff,

v.

SARNER & ASSOCIATES, P.C. et al.

Defendants.

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CIVIL ACTION

NO. 02-4302

**ATTORNEY DEFENDANTS' ANSWER TO  
CROSSCLAIM OF JODI H. BROWN, M.D.**

Defendants, Sarner & Associates, P.C.; Joshua Sarner, Esquire; and Leonard Sarner, Esquire (hereinafter collectively, "attorney defendants"), by and through their attorneys Christie, Pabarue, Mortensen and Young, A Professional Corporation, hereby submit this Answer to the Crossclaim of co-defendant Jodi H. Brown, M.D. (hereinafter "Dr. Brown") and in support thereof aver as follows:

75. - 76. Denied.

**WHEREFORE**, attorney defendants pray that the Court grant judgment in their favor, dismiss the plaintiff's Complaint with prejudice, award attorney defendants all reasonable attorney's fees, costs and expenses incurred by them in defending this case, and provide such other and further relief as may be appropriate. Attorney defendants further pray that the Court

grant judgment in their favor and dismiss Dr. Brown's cross-claim with prejudice.

Respectfully submitted,

**CHRISTIE, PABARUE, MORTENSEN and YOUNG**  
*A Professional Corporation*

By:

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JAMES W. CHRISTIE (I.D. No. 12068)  
WILLIAM F. MCDEVITT (I.D. No. 80206)  
1880 JFK Blvd., 10<sup>th</sup> Floor  
Philadelphia, PA 19103/ (215) 587-1600

Attorneys for Defendants, Sarner & Associates, P.C.;  
Joshua Sarner, Esquire and Leonard Sarner, Esquire  
("Attorney Defendants")

Dated:

**CERTIFICATE OF SERVICE**

I hereby certify that true and correct copies of the foregoing Answer to the Crossclaim of Jodi H. Brown, M.D. of Attorney Defendants were served today via first class mail to all counsel of record at the addresses listed below:

Robert P. Brand, Esquire  
1200 Walnut Street, 5<sup>th</sup> Floor  
Philadelphia, PA 19107

Anthony Baratta, Esquire  
Baratta & Russell, P.C.  
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WILLIAM F. McDEVITT

Dated: